

**REMARKS**

Reconsideration and allowance of the subject application are respectfully requested.

Upon entry of this Amendment, claims 1-25 and 27-48 are pending in the application with claims 37-42 withdrawn from consideration as being directed to a non-elected invention.

As a preliminary matter, Applicant thanks the Examiner for indicating that claims 3-11, 15-20, 25, 32, 43 and 46 would be allowable if rewritten in independent form. However, Applicant respectfully requests the Examiner to hold in abeyance the rewriting of these claims until the Examiner has had the opportunity to reconsider the rejected parent claims in light of the arguments presented below in support of the Applicant's traverse of the rejection.

Claims 1, 2, 12-14, 22, 27-31, 34, 44, 45, 47 and 48 are rejected under 35 U.S.C. § 103(a) as being unpatentable over newly cited Horst (EP 173670) in view of Mechanics of Pneumatic Tires. Claims 21, 23, 33 and 35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Horst (EP 173670) in view of Mechanics of Pneumatic Tires and Yamada (USP 5,423,366). Claims 24 and 36 are rejected under 35 U.S.C. § 103(a) as being unpatentable over newly cited Horst (EP 173670) in view of Mechanics of Pneumatic Tires and Unseld (USP 5,665,298). Applicant respectfully traverses the prior art rejections.

With regard to independent claims 1 and 27, the Examiner cites Horst for allegedly disclosing all of the features of the claimed invention except for the carcass structure being composed of at least one cord-reinforced ply, which the Examiner asserts is disclosed by Mechanics of Pneumatic Tires. In particular, the Examiner cites Figures 1 and 4-6 for allegedly

disclosing neighboring portions of the carcass ply having a center of curvature located outside the carcass ply, as claimed.

By this Amendment, Applicant has amended claims 1 and 27 to recite that “said pneumatic tire has a single maximum width in a circumferential cross section with a cylindrical shape ....” Applicant respectfully submits that Horst does not teach or suggest this feature of the claimed invention. Instead, as noted by the Examiner, Horst discloses multiple maximum section width points. That is, Horst discloses that the tire has two maximum width points corresponding to the end portions of tire held in the rim and the radially outer portion of the tire.

Further, Applicant respectfully submits that the other cited references do not teach or suggest this feature of the claimed invention which is missing from Horst.

Accordingly, Applicant respectfully submits the independent claims 1 and 27, as well as dependent claims 2, 12-14, 21-24, 44, 45, 28-31, 33-36, 47 and 48, should be allowable because the combined references do not teach or suggest all of the features of the claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. Patent Application No. 09/885,164

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



---

Christopher R. Lipp  
Registration No. 41,157

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: October 14, 2004

Attorney Docket No.: Q62630